REMARKS

The Examiner rejected Claims 1-37 for anticipation under 35 U.S.C. §102(e) based on Lincke '326. The communication system and method of Lincke '326 discloses a secured communication wireless link from the mobile node to a proxy server on a home network. *Lincke '326, col. 83, ln 11 – col. 84, ln 54.* However, Lincke '326 does not disclose, teach, or suggest the claimed elements, including the provision of a secure connection with a foreign network.

Under 35 U.S.C. §102, the prior art must disclose each and every claim element for an invention to be anticipated by prior art. *Constant v. Advanced Minor–Devices, Inc.,* 848 F. 2d 1560 (Fed. Cir. 1988). All claim limitations of the invention must also be considered in determining patentability. *Hewlett-Packard Co. v. Bausch & Lomb, Inc.,* 909 F. 2d 1464 (Fed. Cir. 1990). Almost is not enough; the prior art must disclose all the elements. *Connell v. Sears, Roebuck & Co.,* 722 F. 2d 1542 (Fed. Cir. 1983). The absence of any claimed element negates anticipation under §102. *Id.*

Applicant respectfully suggests that the Examiners reading of the Lincke reference is incorrect and the rejections are inappropriate, because the claimed elements are not disclosed, taught, or suggested by Lincke '326.

I. NO SECURE CONNECTION TO THE FOREIGN NETWORK

Claims 1 and 20 have a limitation for "establishing at least one security association between the home network and the foreign network." According to the Examiner, the private network having a proxy server is a home network and the web server is a foreign network. *Office Action, ¶ 5, p. 3* ("The base station is coupled to the

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proxy server via the private network (home network) and communicates to the web server (foreign network) through the Internet.") However, Lincke '326 does not establish a secure communication between the home network (private network 172) and the foreign network (the web server 140). *See Lincke '326, col. 3, ln. 46-59.*

The only messages encrypted in the Lincke '326 Patent are those exchanged between the wireless client and the proxy server on the home network. In Lincke '326, "[m]essages exchanged between the wireless client and the proxy server are encrypted using the transaction specific data encryption key." *Lincke '326, Abstract.* Lincke '326 discloses "a step by step description of a secure transaction between the wireless client 405 and the proxy server 180" on the home network. [*Lincke '326, col. 84, ln. 49-50*], but it does not disclose forming a secure communication to the web server on the foreign network. Since Lincke '326 does not support forming a secure communication link to a foreign network, this claim limitation is not met.

Claims 1 and 20 also have a limitation for "establishing at least one security association between the mobile node and the foreign network using a registration message." As discussed above, there is no secure communication link from the foreign network (web server 140) in Lincke '326. Since there is no secure connection to the foreign network, there cannot be a security association between the mobile node and the foreign network.

II.   NO SECURITY ASSOCIATION DATA

Caims 1, 11, and 20 require that a registration messages transmit security association data. In Lincke '326, however, registration messages are not used to transmit

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sources and the wireless communications device," but this server in Lincke '326 does not disclose, teach or suggest all the activities that must be done to be considered an AAA server. *Lincke '326, col. 6, ln 56-59.*

In the claimed invention, a AAA server can assist in the management of security associations and the uniform transfer of encrypted information packets between AAA servers using a well-defined security protocol. *Application, p. 9, ln. 23-27.* A AAA server also "authenticates the identity of an authorized user, and authorizes the requested activity" and "will provide the accounting function including tracking usage and charges for use of secure transmissions links." *Application, p. 12, ln. 5-8.* Because these AAA functions normally performed by an AAA server are not performed by the proxy server in Lincke '326, the Lincke '326 Patent does not disclose, teach, or suggest the claimed invention.

IV. CONCLUSION

The Applicant respectfully requests reconsideration of the present application because the Examiner's 35 U.S.C. § 102(e) rejection is believed to have been traversed by the present Response. Independent claims 1, 11, 20, and 29 are believed allowable because the Lincke '326 reference fails to disclose, teach, or suggest the claimed invention. Since the dependent claims add further limitations to the allowable independent claims, the Applicant believes the dependent claims are likewise allowable. Accordingly, pending claims 1-37 are believed allowable because the claimed invention is not disclosed, taught, or suggested by the cited references.

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security association data (e.g. such as a public or private key).

When a private key has been compromised in Lincke '326, "the proxy server will throw out the request and send back an error response message to the wireless client 405 containing a new public key and key ID." *Lincke '326, col. 86, ln. 47-52.* In Lincke '326, the request and response messages are used to request and obtain web page data, and "[t]he goal of this protocol is to enable a user to fetch and display a web page on the wireless communications device 100 with a one packet request sent to the proxy server 180." *Lincke '326, Col. 10, ln. 32-34.*

In contrast, the claimed invention requires a registration request and registration response messages are to register the mobile node with a foreign agent and a home agent, and then to transmit security association data to establish security associations. *Application, p. 15, ln. 5 – p. 16, ln. 15.* Because the registration messages in the invention and the request/response messages in Lincke '326 are not the same thing, Lincke '326 does not disclose, teach, or suggest the claimed invention.

III.   NO AAA SERVERS IN LINCKE '326

Claims 1, 11, 20, and 29 (all independent claims) also require "routing the information packet through an AAA server." But, AAA servers are not disclosed in Lincke '326.

In Lincke '326, the disclosed proxy server communicates with the wireless network to translate message formats from the wireless network into an Internet message format. *Lincke '326, col. 10, ln 5-26.* In other words, the proxy server in Lincke '326 "facilitates communications between web servers, mail servers, and other Internet data

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It is believed that no additional fees are necessary for this filing. If additional fees are required for filing this response, then the appropriate fees should be deducted from D. Scott Hemingway's Deposit Account No. 501,270.

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